CUMULATIVE INDEX

This index covers material published in The Journal of Taxation, Volume 38, January 1973-June 1973. This index is published twice annually, at the conclusion of each volume—in December and in June.

ACCOUNTING

ADR lives for assets used in communications reduced, 38JTAX264, May73.
Are Proposed kickback Regulations an unwarranted extension of the Code?, *by Thomas S. Meltzer*, 38JTAX166, Mar73.
Can a modified absorption method be used to determine the cost of inventory?, *by Charles H. Gibson*, 38JTAX 32, Jan73.
Capital as a material income-producing factor for 1348 purposes: An Analysis, *by Michael L. Moore*, 38JTAX328, Jun 73.
CA-2 decision permits deduction of cost of new merchandising plan, 38JTAX 332, Jun73.
Devaluation of the dollar: What are the tax implications?, *by Paul M. Bodner and Alan L. Farkas*, 38JTAX210, Apr 73.
Embezzlement loss yields double deduction: Tax Court, 38JTAX213, Apr 73.
Final Regulations tighten group-term exclusion insurance rules, 38JTAX213, Apr73.
Full absorption method of inventory costing required by new Proposed Regs, 38JTAX262, May73.
In denying demolition loss, TC says "no" to new argument, 38JTAX264, May73.
Insurance activity was taxpayer's not his corporation's, 38JTAX111, Feb73.
Internal Revenue Service fills several high posts, 38JTAX36, Jan73.
IRS won't recognize validity of related-party installment sales, 38JTAX333, Jun73.
Partnership may be same taxpayer as previous proprietor says CA-5, 38 JTAX331, Jun73.
Pollution control facility amortization deduction clarified, 38JTAX112, Feb73.
Tax Court approves two real estate tax shelter deals: cases may be appealed, 38JTAX263, May73.
Tax Curt upholds method of reporting income on land controls, 38JTAX113 Feb73.
T.C. allows capital gains on sale of patents to related corporations, 38JTAX 212, Apr73.
The Rule of 78's can create increased interest deductions for the borrower, *by Barry H. Frank*, 38JTAX108, Feb 73.
Top level changes in Treasury Department personnel, 38JTAX214, Apr73.
Threat of condemnation can convert aim of holding land, 38JTAX333, Jun73.
Use in going business does not enhance value of assets, 38JTAX 213, Apr73.
When is goodwill entertainment "directly related" to business for 274 purposes?, 38JTAX265, May73.

COMPENSATION

Effect of IRS's new rule limiting capital gain on employee plan payments, 38 JTAX61, Jan73.
How Phase III of the Economic Stabilization Program affects executive compensation, *by Steven R. Hirschtick*, 38 JTAX322, Jun73.
IRS names three new District Directors, 38JTAX149, Mar73.
IRS relents on voluntary contributions to H.R. 10 plans, 38JTAX62, Jan73.
New qualified plans in 1972 exceed 1971 total, 38JTAX327, Jun73.
New rules for filing qualified plan forms issued by Treasury, 38JTAX118, Feb 73.
Revenue Ruling 73-26 signals the end of tandem stock options: Will it stick?, *by James E. McKinney*, 38JTAX150, Mar73.
Sale of option qualifies for maximum tax relief, 38JTAX62, Jan73.
Supreme Court in *Basye* taxes partnership on plan payments made for it by corporation, *by Andrew H. Cox*, 38 JTAX270, May73.
Tax Court says reorganization options are compensation, 38JTAX118, Feb73.
Tax deferred salary reduction annuity plans limited, 38JTAX149, Mar73.
Under what conditions may employees make withdrawals from qualified plans?, *by James E. McKinney*, 38 JTAX116, Feb73.
Working with flexible settlement options for qualified employee plans, *by William L. Sollee*, 38JTAX146, Mar73.

CORPORATE

Acquired corp's shares in C reorg. need not be distributed, 38JTAX199, Apr73.
Acquiring corp. can assume acquired corp.'s expenses in tax-free reorg., 38 JTAX274, May73.
Another straw corporation turns out to be the real thing, 38JTAX365, Jun73.
Are qualified plan contributions "compensation," 38JTAX198, Apr73.
CA-5 holds Section 269 can reach post-acquisition losses, 38JTAX365, Jun73.
Circuit court decisions may adversely affect housing co-ops, 38JTAX13, Jan'73.
Combination of reasonable needs averts 531 penalty, 38JTAX366, Jun73.
Constructive dividend by parent/sub loan limited, 38JTAX196, Apr73.
Eighth Circuit's *Baker* decision: Filling a statutory gap by judicial pragmatism, *by Haskell Edelstein*, 38JTAX66, Feb73.
How unwanted assets can be spun off without destroying a reorganization, *by Gerald Stephan Susman*, 38JTAX 360, Jun73.
IRS successfully subpoenas tax preparer's records, 38JTAX14, Jan73.
Partial assignment of patent qualifies for 351 treatment, 38JTAX197, Apr73.
Practitioner's guide to the analysis and structuring of tax-free acquisitions, *by Paul F. Marx*, 38JTAX194, Apr73.
Satisfying the "active business" requirement for tax-free spin-off of a functional division, *by Leslie S. Klinger*, 38 JTAX10, Jan73.
Selling expense deductions in 337 usually denied, 38JTAX198, Apr73.
Tax benefit of investment in subsidiary is lost in 332 liquidation, 38JTAX13, Jan73.
Tax Court bars write-off of recapitalization cost, 38JTAX198, Apr73.
Tax Court integrates dividend into sales price, 38JTAX15, Jan73.
Tax Court reaffirms position on effect of options on earnings and profits, 38 JTAX14, Jan'73.
Tax Court rejects IRS prohibition on Section 302(c)(2) waiver, 38JTAX 364, Jun73.
Tax preferences cost corporations $219 million extra, 38JTAX367, Jun73.
357(c) liability of cash basis taxpayers limited by CA-2, 38JTAX197, Apr73.
Total corporate tax liability increases by nearly 20%, 38JTAX196, Apr73.

ESTATES, TRUSTS AND GIFTS

A loan plus a gift equals a taxable event says TC, 38JTAX352, Jun73.
"Balancing" distributions upset by Court of Claims, 38JTAX92, Feb73.
CA-5 extends concept of incidents of ownership, 38JTAX290, May'73.
CA-6 KO's Reg restrictions on estate expense deductions, 38JTAX352, Jun73.
Charitable remainder trusts: How to comply with final Regulations, *by Hans P. Olsen and James R. Ledwith*, 38 JTAX2, Jan73.
Contemplation-of-death in payment of life insurance premiums: Where do we now stand?, *by Paul H. Walker*, 38 JTAX348, Jun73.
Expense payments from estate income result in second tax, 38JTAX7, Jan73.
Factors that are presently being emphasized in valuing a closely-held corporation, *by David T. Vass*, 38JTAX356, Jun73.
How to achieve optimum income, gift and estate tax benefits in a will contest, *by E. David Kemp*, 38JTAX285, May73.
Income, gift and estate tax rules of private annuities: How they work, *by G. Booker Ellis, Jr.*, 38JTAX234, Apr73.
Interest-free loans are a gift, insists IRS, 38JTAX240, Apr73.
IRS emphasizes its opposition to the *Stern* case, 38JTAX142, Mar73.
Is a co-owner a "willing buyer" for valuation purposes?, 38JTAX354, Jun73.
"Joint will" need not always wipe out marital deduction, 38JTAX93, Feb73.
New danger for payment of premiums by insured, 38JTAX7, Jan73.
No deferral of income for grantor of trust, 38JTAX142, Mar73.
No income deduction for estate's corpus payments to charity-beneficiary, 38 JTAX6, Jan73.
Non-qualified plans for widows' annuities: Proper planning can keep them out of estate, *by Myron L. Joseph*, 38 JTAX94, Feb73.
Recent cases foreclose usefulness of life insurance-annuity packages, *by Richard Halberstein*, 38JTAX90, Feb73.
Regulations liberalize income option unitrust treatment, 38JTAX142, Mar73.
Residuary bequest is not reduced in IRD computation, 38JTAX241, Apr73.
Savings bonds must be re-registered for effective transfer, 38JTAX240, Apr73.
Trust funds can't be used for support; exclusion not lost, 38JTAX92, Feb73.

EXEMPT INSTITUTIONS

Avoiding limits on private foundation business holdings: planning possibilities, *by Dale Bandy*, 38JTAX136, Mar 73.
Commissioner discusses industry wide audits and exempt organizations, 38 JTAX140, Mar73.
Final Regs on Section 4945: Working with the new rules restricting foundations' activities, *by Michael I. Sanders*, 38JTAX130, Mar73.
Final Regs provide comprehensive rules for foundation distribution requirements, *by Francis M. Gregory, Jr. and Donald V. Moorehead*, 38JTAX370, Jun73.
How grants to organizations by private foundations are affected by the final Regs, *by Michael I. Sanders*, 38JTAX 299, May73.
How non-exempt trust can avoid private foundation status, 38JTAX123, Feb73.
Loss of exemption may raise a constitutional question, 38JTAX375, Jun73.
Non-profit homes for the aged: An analysis of their current tax exempt status, *by Robert S. Bromberg*, 38 JTAX54, Jan73.
Non-profit homes for the aged: How to avoid private foundation status, *by Robert S. Bromberg*, 38JTAX120, Feb 73.
Private foundations: Final Regs on 4945 clarify and bring order to operating rules, *by Michael I. Sanders*, 38JTAX 246, Apr73.

FARMING

Nonqualified written notices of allocation may salvage a coop's otherwise lost benefits, *by Myron J. Fleck*, 38JTAX 378, Jun73.

FRAUD AND NEGLIGENCE

Supreme Court's *Couch* decision signals new directions in guarding clients' records, *by Melvin A. Coffee*, 38JTAX258, May73.

INTERNATIONAL TRADE

Can a foreign freight forwarding corporation ever qualify as a DISC?, 38 JTAX88, Feb73.
IRS issues temporary Regs on making the DISC election, 38JTAX183, Mar73.
Marginal costing for DISCs: An explanation and analysis of Treasury's Proposed Regulations, *by Louis M. Kauder*, 38JTAX304, May73.
New decisions delineate tests for foreign situs trust—private annuity transactions, *by Burton W. Kanter*, 38JTAX 82, Feb73.
Non-resident alien wife taxed on half of community income, 38JTAX182, Mar 73.
Proposed DISC Regs: Maintaining DISC status through use of producer's loans, *by Frederick A. Richman*, 38JTAX229, Apr73.
Proposed DISC Regs: Planning for deemed and actual distributions in qualified years, *by Jon E. Bischel*, 38 JTAX178, Mar73.
States adopting more liberal tra... their treatment of DISCs, *by Wal... Diamond*, 38JTAX18, Jan73.
Tax advantages available to U. S. ... panies doing business in Puerto ... *by Ralph J. Sierra, Jr.*, 38JTA... May73.
The Interest Equalization Tax: A ... for the tax advisor on its curre... plications, *by Charles I. Kingso...* JTAX23, Jan73.
Treasury liberalizes Regulations on ... rency transaction reporting, 38J... 22, Jan73.

PAYROLL

Confusion over scope of 100% pe... makes it a most "settleable" ... *Joseph N. Lindeman*, 38JTAX... 73.

PARTNERSHIPS AND SUBCHAPT...

After the *Meyer* case: An analy... tax-free partnership exchange... *Vorris J. Blankenship*, 38JTA... May73.
CA-7: Thin incorp. irrelevant to ... chapter S: Regs invalid, 38JTA... May73.
IRS's strict Subchapter S second-... of-stock rule rejected in three ... ions, 38JTAX57, Jan73.
Ninth Circuit permits retroactive ... chapter S consents, 38JTAX128, ... 73.
Partnerships and Subchapter S cor... tions given flexibility in tax ... change, 38JTAX58, Jan73.
Partnership taxation: Interest ... basis adjustments and unrealise... ceivables, *by James O. Hewitt ... John S. Pennell*, 38JTAX219, Ap...
Practitioner's guide to the taxati... partnerships and partners, *by J... O. Hewitt and John S. Penne...* JTAX157, Mar73.
What are the "hidden effects" of ... legislation upon Subchapter S el... ity?, 38JTAX152, Mar73.

PERSONAL

Allocation on check may save depen... exemption, 38JTAX188, Mar73.
Does the Service have a quota s... after all?, 38JTAX203, Apr73.
Final Regs on moving expense a... ances: A complex area clarified by ... rules, *by Joseph J. DeSalvo*, 38J... 74, Feb73.
How Treasury's final Regulations o... new hobby loss rules operate, ... *Melvin Crouch*, 38JTAX184, Mar...
IRS suggests way of minimizing ... trouble spots in filing, 38JTA... Apr73.
Lump-sum payment tied to remar... can be alimony, 38JTAX188, Mar...
Oral statements can now support T... deductions, 38JTAX189, Mar73.
Per diem rate liberalized for ove... travel, 38JTAX41, Jan73.
Practitioner's guide to present plan... of charitable contribution deduc... *by James K. Jackson*, 38JTA... May73.
Sale, rather than gift, of future in... ok'd by CA-6, 38JTAX202, Apr73.
Sick pay exclusion for disability be... applies up to mandatory retire... age of taxpayer, 38JTAX202, Apr...
The investment-interest-deduction ... itation under Section 163(d) is ... of 265(2) cases, *by Dale F. Jeffe...* JTAX38, Jan73.

PROCEDURES

Alexander replaces Walters as IRS ... 38JTAX316, May73.
All collections of taxes up over 9.5... fiscal 1972, 38JTAX317, May73.
Does Section 7605(b) create a right ... out a remedy in a civil tax refus... ceeding?, *by Philip J. Erbach...* JTAX172, Mar73.
Dual practice redefined by new ... canon, 38JTAX316, May73.
Gambler's tax due even if return c... compelled, 38JTAX340, Jun73.
IRS reveals number of audits h... creased, 38JTAX343, Jun73.
Minimum fees for tax practice a... tate planning set forth by Al... Bar, 38JTAX315, May73.
New IRS directors named, 38JTA... May73.
Operating instructions for IRS p... nel published, 38JTAX177, Mar...
Partnership between lawyer and c...

CUMULATIVE INDEX

This index covers material published in The Journal of Taxation, Volume 38, January 1973-June 1973. This index is published twice annually, at the conclusion of each volume—in December and in June.

ACCOUNTING

ADR lives for assets used in communications reduced, 38JTAX264, May73.
Are Proposed kickback Regulations an unwarranted extension of the Code?, *by Thomas S. Meltzer*, 38JTAX166, Mar73.
Can a modified absorption method be used to determine the cost of inventory?, *by Charles H. Gibson*, 38JTAX 32, Jan73.
Capital as a material income-producing factor for 1348 purposes: An Analysis, *by Michael L. Moore*, 38JTAX328, Jun 73.
CA-2 decision permits deduction of cost of new merchandising plan, 38JTAX 332, Jun73.
Devaluation of the dollar: What are the tax implications?, *by Paul M. Bodner and Alan L. Farkas*, 38JTAX210, Apr 73.
Embezzlement loss yields double deduction: Tax Court, 38JTAX213, Apr 73.
Final Regulations tighten group-term exclusion insurance rules, 38JTAX213, Apr73.
Full absorption method of inventory costing required by new Proposed Regs, 38JTAX262, May73.
In denying demolition loss, TC says "no" to new argument, 38JTAX264, May73.
Insurance activity was taxpayer's not his corporation's, 38JTAX111, Feb73.
Internal Revenue Service fills several high posts, 38JTAX36, Jan73.
IRS won't recognize validity of related-party installment sales, 38JTAX333, Jun73.
Partnership may be same taxpayer as previous proprietor says CA-5, 38 JTAX331, Jun73.
Pollution control facility amortization deduction clarified, 38JTAX112, Feb73.
Tax Court approves two real estate tax shelter deals: cases may be appealed, 38JTAX263, May73.
Tax Curt upholds method of reporting income on land controls, 38JTAX113 Feb73.
T.C. allows capital gains on sale of patents to related corporations, 38JTAX 212, Apr73.
The Rule of 78's can create increased interest deductions for the borrower, *by Barry H. Frank*, 38JTAX108, Feb 73.
Top level changes in Treasury Department personnel, 38JTAX214, Apr73.
Threat of condemnation can convert aim of holding land, 38JTAX333, Jun73.
Use in going business does not enhance value of assets, 38JTAX 213, Apr73.
When is goodwill entertainment "directly related" to business for 274 purposes?, 38JTAX265, May73.

COMPENSATION

Effect of IRS's new rule limiting capital gain on employee plan payments, 38 JTAX61, Jan73.
How Phase III of the Economic Stabilization Program affects executive compensation, *by Steven R. Hirschtick*, 38 JTAX322, Jun73.
IRS names three new District Directors, 38JTAX149, Mar73.
IRS relents on voluntary contributions to H.R. 10 plans, 38JTAX62, Jan73.
New qualified plans in 1972 exceed 1971 total, 38JTAX327, Jun73.
New rules for filing qualified plan forms issued by Treasury, 38JTAX118, Feb 73.
Revenue Ruling 73-26 signals the end of tandem stock options: Will it stick?, *by James E. McKinney*, 38JTAX150, Mar73.
Sale of option qualifies for maximum tax relief, 38JTAX62, Jan73.
Supreme Court in *Basye* taxes partnership on plan payments made for it by corporation, *by Andrew H. Cox*, 38 JTAX270, May73.
Tax Court says reorganization options are compensation, 38JTAX118, Feb73.
Tax deferred salary reduction annuity plans limited, 38JTAX149, Mar73.
Under what conditions may employees make withdrawals from qualified plans?, *by James E. McKinney*, 38 JTAX116, Feb73.
Working with flexible settlement options for qualified employee plans, *by William L. Sollee*, 38JTAX146, Mar73.

CORPORATE

Acquired corp's shares in C reorg. need not be distributed, 38JTAX199, Apr73.
Acquiring corp. can assume acquired corp.'s expenses in tax-free reorg., 38 JTAX274, May73.
Another straw corporation turns out to be the real thing, 38JTAX365, Jun73.
Are qualified plan contributions "compensation," 38JTAX198, Apr73.
CA-5 holds Section 269 can reach post-acquisition losses, 38JTAX365, Jun73.
Circuit court decisions may adversely affect housing co-ops, 38JTAX13, Jan'73.
Combination of reasonable needs averts 531 penalty, 38JTAX366, Jun73.
Constructive dividend by parent/sub loan limited, 38JTAX196, Apr73.
Eighth Circuit's *Baker* decision: Filling a statutory gap by judicial pragmatism, *by Haskell Edelstein*, 38JTAX66, Feb73.
How unwanted assets can be spun off without destroying a reorganization, *by Gerald Stephan Susman*, 38JTAX 360, Jun73.
IRS successfully subpoenas tax preparer's records, 38JTAX14, Jan73.
Partial assignment of patent qualifies for 351 treatment, 38JTAX197, Apr73.
Practitioner's guide to the analysis and structuring of tax-free acquisitions, *by Paul F. Marx*, 38JTAX194, Apr73.
Satisfying the "active business" requirement for tax-free spin-off of a functional division, *by Leslie S. Klinger*, 38 JTAX10, Jan73.
Selling expense deductions in 337 usually denied, 38JTAX198, Apr73.
Tax benefit of investment in subsidiary is lost in 332 liquidation, 38JTAX13, Jan73.
Tax Court bars write-off of recapitalization cost, 38JTAX198, Apr73.
Tax Court integrates dividend into sales price, 38JTAX15, Jan73.
Tax Court reaffirms position on effect of options on earnings and profits, 38 JTAX14, Jan'73.
Tax Court rejects IRS prohibition on Section 302(c)(2) waiver, 38JTAX 364, Jun73.
Tax preferences cost corporations $219 million extra, 38JTAX367, Jun73.
357(c) liability of cash basis taxpayers limited by CA-2, 38JTAX197, Apr73.
Total corporate tax liability increases by nearly 20%, 38JTAX196, Apr73.

ESTATES, TRUSTS AND GIFTS

A loan plus a gift equals a taxable event says TC, 38JTAX352, Jun73.
"Balancing" distributions upset by Court of Claims, 38JTAX92, Feb73.
CA-5 extends concept of incidents of ownership, 38JTAX290, May'73.
CA-6 KO's Reg restrictions on estate expense deductions, 38JTAX352, Jun73.
Charitable remainder trusts: How to comply with final Regulations, *by Hans P. Olsen and James R. Ledwith*, 38 JTAX2, Jan73.
Contemplation-of-death in payment of life insurance premiums: Where do we now stand?, *by Paul H. Walker*, 38 JTAX348, Jun73.
Expense payments from estate income result in second tax, 38JTAX7, Jan73.
Factors that are presently being emphasized in valuing a closely-held corporation, *by David T. Vass*, 38JTAX356, Jun73.
How to achieve optimum income, gift and estate tax benefits in a will contest, *by E. David Kemp*, 38JTAX285, May73.
Income, gift and estate tax rules of private annuities: How they work, *by G. Booker Ellis, Jr.*, 38JTAX234, Apr73.
Interest-free loans are a gift, insists IRS, 38JTAX240, Apr73.
IRS emphasizes its opposition to the *Stern* case, 38JTAX142, Mar73.
Is a co-owner a "willing buyer" for valuation purposes?, 38JTAX354, Jun73.
"Joint will" need not always wipe out marital deduction, 38JTAX93, Feb73.
New danger for payment of premiums by insured, 38JTAX7, Jan73.
No deferral of income for grantor of trust, 38JTAX142, Mar73.
No income deduction for estate's corpus payments to charity-beneficiary, 38 JTAX6, Jan73.
Non-qualified plans for widows' annuities: Proper planning can keep them out of estate, *by Myron L. Joseph*, 38 JTAX94, Feb73.
Recent cases foreclose usefulness of life insurance-annuity packages, *by Richard Halberstein*, 38JTAX90, Feb73.
Regulations liberalize income option unitrust treatment, 38JTAX142, Mar73.
Residuary bequest is not reduced in IRD computation, 38JTAX241, Apr73.
Savings bonds must be re-registered for effective transfer, 38JTAX240, Apr73.
Trust funds can't be used for support; exclusion not lost, 38JTAX92, Feb73.

EXEMPT INSTITUTIONS

Avoiding limits on private foundation business holdings: planning possibilities, *by Dale Bandy*, 38JTAX136, Mar 73.
Commissioner discusses industry wide audits and exempt organizations, 38 JTAX140, Mar73.
Final Regs on Section 4945: Working with the new rules restricting foundations' activities, *by Michael I. Sanders*, 38JTAX130, Mar73.
Final Regs provide comprehensive rules for foundation distribution requirements, *by Francis M. Gregory, Jr. and Donald V. Moorehead*, 38JTAX370, Jun73.
How grants to organizations by private foundations are affected by the final Regs, *by Michael I. Sanders*, 38JTAX 299, May73.
How non-exempt trust can avoid private foundation status, 38JTAX123, Feb73.
Loss of exemption may raise a constitutional question, 38JTAX375, Jun73.
Non-profit homes for the aged: An analysis of their current tax exempt status, *by Robert S. Bromberg*, 38 JTAX54, Jan73.
Non-profit homes for the aged: How to avoid private foundation status, *by Robert S. Bromberg*, 38JTAX120, Feb 73.
Private foundations: Final Regs on 4945 clarify and bring order to operating rules, *by Michael I. Sanders*, 38JTAX 246, Apr73.

FARMING

Nonqualified written notices of allocation may salvage a coop's otherwise lost benefits, *by Myron J. Fleck*, 38JTAX 378, Jun73.

FRAUD AND NEGLIGENCE

Supreme Court's *Couch* decision signals new directions in guarding clients' records, *by Melvin A. Coffee*, 38JTAX258, May73.

INTERNATIONAL TRADE

Can a foreign freight forwarding corporation ever qualify as a DISC?, 38 JTAX88, Feb73.
IRS issues temporary Regs on making the DISC election, 38JTAX183, Mar73.
Marginal costing for DISCs: An explanation and analysis of Treasury's Proposed Regulations, *by Louis M. Kauder*, 38JTAX304, May73.
New decisions delineate tests for foreign situs trust—private annuity transactions, *by Burton W. Kanter*, 38JTAX 82, Feb73.
Non-resident alien wife taxed on half of community income, 38JTAX182, Mar 73.
Proposed DISC Regs: Maintaining DISC status through use of producer's loans, *by Frederick A. Richman*, 38JTAX229, Apr73.
Proposed DISC Regs: Planning for deemed and actual distributions in qualified years, *by Jon E. Bischel*, 38 JTAX178, Mar73.
States adopting more liberal tra... their treatment of DISCs, *by Wal... Diamond*, 38JTAX18, Jan73.
Tax advantages available to U. S. ... panies doing business in Puerto ... *by Ralph J. Sierra, Jr.*, 38JTA... May73.
The Interest Equalization Tax: A ... for the tax advisor on its curre... plications, *by Charles I. Kingso...* JTAX23, Jan73.
Treasury liberalizes Regulations on ... rency transaction reporting, 38J... 22, Jan73.

PAYROLL

Confusion over scope of 100% pe... makes it a most "settleable" ... *Joseph N. Lindeman*, 38JTAX... 73.

PARTNERSHIPS AND SUBCHAPT...

After the *Meyer* case: An analy... tax-free partnership exchange... *Vorris J. Blankenship*, 38JTA... May73.
CA-7: Thin incorp. irrelevant to ... chapter S: Regs invalid, 38JTA... May73.
IRS's strict Subchapter S second-... of-stock rule rejected in three ... ions, 38JTAX57, Jan73.
Ninth Circuit permits retroactive ... chapter S consents, 38JTAX128, ... 73.
Partnerships and Subchapter S cor... tions given flexibility in tax ... change, 38JTAX58, Jan73.
Partnership taxation: Interest ... basis adjustments and unrealise... ceivables, *by James O. Hewitt ... John S. Pennell*, 38JTAX219, Ap...
Practitioner's guide to the taxati... partnerships and partners, *by J... O. Hewitt and John S. Penne...* JTAX157, Mar73.
What are the "hidden effects" of ... legislation upon Subchapter S el... ity?, 38JTAX152, Mar73.

PERSONAL

Allocation on check may save depen... exemption, 38JTAX188, Mar73.
Does the Service have a quota s... after all?, 38JTAX203, Apr73.
Final Regs on moving expense a... ances: A complex area clarified by ... rules, *by Joseph J. DeSalvo*, 38J... 74, Feb73.
How Treasury's final Regulations o... new hobby loss rules operate, ... *Melvin Crouch*, 38JTAX184, Mar...
IRS suggests way of minimizing ... trouble spots in filing, 38JTA... Apr73.
Lump-sum payment tied to remar... can be alimony, 38JTAX188, Mar...
Oral statements can now support T... deductions, 38JTAX189, Mar73.
Per diem rate liberalized for ove... travel, 38JTAX41, Jan73.
Practitioner's guide to present plan... of charitable contribution deduc... *by James K. Jackson*, 38JTA... May73.
Sale, rather than gift, of future in... ok'd by CA-6, 38JTAX202, Apr73.
Sick pay exclusion for disability be... applies up to mandatory retire... age of taxpayer, 38JTAX202, Apr...
The investment-interest-deduction ... itation under Section 163(d) is ... of 265(2) cases, *by Dale F. Jeffe...* JTAX38, Jan73.

PROCEDURES

Alexander replaces Walters as IRS ... 38JTAX316, May73.
All collections of taxes up over 9.5... fiscal 1972, 38JTAX317, May73.
Does Section 7605(b) create a right ... out a remedy in a civil tax refus... ceeding?, *by Philip J. Erbach...* JTAX172, Mar73.
Dual practice redefined by new ... canon, 38JTAX316, May73.
Gambler's tax due even if return c... compelled, 38JTAX340, Jun73.
IRS reveals number of audits h... creased, 38JTAX343, Jun73.
Minimum fees for tax practice a... tate planning set forth by Al... Bar, 38JTAX315, May73.
New IRS directors named, 38JTA... May73.
Operating instructions for IRS p... nel published, 38JTAX177, Mar...
Partnership between lawyer and c...

nt possible in theory, 38JTAX341, n73.
e issues list released by Service, 38 AX342, Jun73.
osed Regulations outline rules on closure by tax preparers, 38JTAX 5, Mar73.
rm-preparer fined $4,000 for not pro- ing workpapers, 38JTAX318, May
g can't be retroactive if effect is fair, 38JTAX342, Jun73.
procedure in bankruptcy proceed- s: Normal safeguards are denied xpayer, *by Marilyn Phelan*, 38JTAX 6, Jun73.
high Treasury aides named, 38 AX106, Feb73.
rant violates 5th Amendment says nth Circuit, 38JTAX341, Jun73.
n may a client's taxes be compro- sed under Section 7122: A practi- ner's guide, *by Harold Kamens and illiam A. Ancier*, 38JTAX102, Feb73.

REAL ESTATE

Land cost expenditures: Recent trend shows many such costs are now depreciable, *by Robert F. Henderson*, 38 JTAX78, Feb73.
Treasury's Proposed Regs. on REITs first steps to solve an abundance of problems, *by Louis Friedman*, 38JTAX 244, Apr73.

SHOP TALK

A helpful tool for tax men: table of contents for Regs, 38JTAX319, May73.
Can borrowing work a disposition of installment obligations?, 38JTAX381, Jun73.
Could secondary followed by tender add up to redemption?, 38JTAX319, May 73.
Debentures convertible into other stock, 38JTAX65, Jan73.
Do tax return preparation fees really result in fiscal drain?, 38JTAX255, Apr 73.
Florida practice of condominium rent reservations attacked, 38JTAX382, Jun73.
Hardening of association "safe harbor" rules creates problems, 38JTAX255, Apr73.
How annulment and changing marital concepts affect Code, 38JTAX192, Mar 73.
How commuting-with-tools discrepancy affects pilots, 38JTAX319, May73.
IRS's year-end salary deferment Ruling causes concern, 38JTAX63, Jan73.
ITT-Hartford ruling controversy continues in limelight, 38JTAX381, Jun83.
Modification of warrant may avoid income realization, 38JTAX63, Jan73.
More on tax return preparation fees, 38 JTAX320, May73.
Newly docketed case may mean PHC trouble, 38JTAX193, Mar73.
No 5th amendment for papers in accountant's hands, 38JTAX191, Mar73.
Quarterly filing required to rebut IET presumption, 38JTAX191, Mar73.
Real estate prospectus cautious in tax forecast, 38JTAX64, Jan73.
Revocable trust arrangements result in Tax Court foul-ups, 38JTAX255, Apr 73.
Rev. Rul. 72-350 on basis of partnership interests, 38JTAX191, Mar73.
Some added wrinkles on basis in contemplation of death, 38JTAX321, May73.
Still more on income from expiring warrants, 38JTAX255, Apr73.
Transfer of assets to partnership effects 337 liquidation, 38JTAX383, Jun73.

SPECIAL INDUSTRIES

Depreciation under Section 167(1) for utilities after the *Memphis Light* decision, *by Timothy M. Kelleher*, 38 JTAX44, Jan73.

AUTHORS

William A. Ancier 66
Dale Bandy 234
Jon E. Bischel 172
Vorris J. Blankenship 210
Paul M. Bodner 378
Robert S.. Bromberg 120
Melvin A. Coffee 108
Andrew H. Cox 244
Melvin Crouch 32
Joseph J. De Salvo 370
Walter H. Diamond 90
Haskell Edelstein 157, 219
G. Booker Ellis, Jr. 322
Philip J. Erbacher 292
Alan L. Farkas
Myron J. Fleck
Barry H. Frank
Louis Friedman
Charles H. Gibson
Francis M. Gregory, Jr.
Richard Halberstein
James O. Hewitt
Steven R. Hirschtick
James K. Jackson
Dale F. Jeffers 38
Myron L. Joseph 94
Harold Kamens 102
Burton W. Kanter 82
Louis M. Kauder 304
Timothy M. Kelleher 44
E. David Kemp 285
Charles I. Kingson 23
Leslie S. Klinger 10
James R. Ledwith 2
Joseph N. Lindeman 50
Paul F. Marx 194
James E. McKinney 116, 150
Thomas S. Meltzer 166
Michael L. Moore 328
Donald V. Moorehead 370
Hans P. Olsen 2
John S. Pennell 157, 219
Marilyn Phelan 336
Frederick A. Richman 229
Michael I. Sanders 130, 246, 299
Ralph J. Sierra, Jr. 310
William L. Sollee 146
Gerald Stephan Susman 360
David T. Vass 356
Paul H. Walker 348

INDEX OF NEW DECISIONS AND IRS ACTIONS REPORTED IN THIS ISSUE

THE INDEX below lists new court decisions, cases where certiorari has been granted or denied, and IRS actions involving acquiescences, nonacquiescences, Revenue Rulings and Procedures, TIR's, etc. Cases are listed by the significant word or words in the citation, generally the taxpayer's last or principal name. The number is the page where the summary will be found. An asterisk (*) indicates that the case is discussed in an article on the page shown.

Court Decisions

*Americans United, Inc. 375
*American Trading and Production Corp. 366
Andrew Tell Investment Co. 334
Beinan 346
Bernabei 345
Bernard 335
Biedenharn Realty Co. 334
Block-Southland Sportswear Co. 344
Bob Jones University 376
*Briarcliff Candy Corp. 332
Callan 368
Cataldo 344
Chandler 354
Cole, Estate of 335
Cosmopolitan Credit Corp. 346
Cox Estate 355
*Crawford 364
Embry Family Trust 335
*Farmers' and Merchants Bank 342
Fountain 346
Frankford Quaker Grocery Co. 335
Galin 359
Gay 346
Green 344
Grenshaw County Private School Foundation 345
*Grogan 331
*Hall Paving Co. 365
Hardy 359
Harrison 346
*Harrison Property Management Co. 365
Hartman Jr. 376
Hatch 344
Hill, Estate of 345
Hodge 334
Humble Oil and Refining Co. 345
ISI Corporation 334
ISI Corporation 344
Jadach 327
*Johnson 352
Klein 359
Kraus 369
Lamb 346
Lifter 345
Lisner 346
*Lucia 340
Luetzow 358
Marshall Investment Co., Inc. 368
Mau 354
McCoy 376
McLemore 368
Melcher, Estate of 335
Merchants Industrial Bank 355
Mid-West Business Forms, Inc. 344
Miller 334
Mitchell 335
Moses 359
Myers 334
Newhouse 335
O.K. Electric Co. 327
Pacific Security Cos. 368
*Park, Estate of 352
Paula Construction 368
Price 358
Rafter 358
Raidoso Racing Association 345
Rayward 345
*Ridgewood Land Company 333
Robinson 345
Rosenbaum 335
*Rothgery 354
Sanders 368
Schrader 344
Sherman Construction Corp. 327
Sieh 368
Sipkoff 345
Sohosky 334
Thornton 344
Tracy 369
Turner 345
United American Insurance Co. 355
Vanderburgh 346
Van de Steeg 334
Vestal 334
*VonderAhe 341
Wiebusch 346

Revenue Rulings

Del. Order No. 83 (Rev. 4) 344
Rev. Rul. 73-98 354
Rev. Rul. 73-115 355
Rev. Rul. 73-117 369
Rev. Rul. 73-118 369
Rev. Rul. 73-119 369
Rev. Rul. 73-133 355
Rev. Rul. 73-136 359
Rev. Rul. 73-137 359
Rev. Rul. 73-138 380
Rev. Rul. 73-142 355
Rev. Rul. 73-143 355
Rev. Rul. 73-145 334
Rev. Rul. 73-146 327
Rev. Rul. 73-147 327
Rev. Rul. 73-148 380
Rev. Rul. 73-149 355
Rev. Rul. 73-154 359
Rev. Rul. 73-155 359
Rev. Rul. 73-156 359
*Rev. Rul. 73-157 333
Rev. Rul. 73-158 369
Rev. Rul. 73-159 369
Rev. Rul. 73-160 333
Rev. Rul. 73-162 376
Rev. Rul. 73-163 369
Rev. Rul. 73-164 376
Rev. Rul. 73-165 376
Rev. Rul. 73-166 376
Rev. Rul. 73-200 359
Rev. Rul. 73-201 359

Regulations

Fed. Reg. 12/20/72 369
Fed. Reg. 3/9/73 369
Prop. Fed. Reg. 3/23/73 333
Fed. Reg. 3/30/73 344
Fed. Reg. 4/12/73 346
Fed. Reg. 4/17/73 376

Certiorari Denied

Detroit Bank & Trust Co. 354
Flood 344
Newman 346

Revenue Procedures

Rev. Proc. 73-8 IRB 1973-14 344

Announcements

*IRS Prime Issues 1/1/73 342
TD 7262 3/2/73 367
TD 7264 3/7/73 369
TD 7269 4/12/73 358
TD 7271 4/1/73 358
Announcement 73-27, IRB 1973-10 369
Announcement 73-29, IRB 1973-11 327
Announcement 73-33 IRB 1973-12 344
Announcement 73-35 IRB 1973-12 344
Announcement 73-41 IRB 1973-14 359
Announcement 73-42 IRB 1973-14 368

CUMULATIVE INDEX

This index covers material published in The Journal of Taxation, Volume 39, July 1973-December 1973. This index is published twice annually, at the conclusion of each volume—in June and in December.

ACCOUNTING

Are capital gains of realty dealers always subject to attack?, 39JTAX341, Dec73.
CA-9 broadens definition of Sec. 38 as qualifying property, 39JTAX106, Aug 73.
Coping with Treasury's tough new Proposed Regulations on inventory valuation, *by Robert I. Chalnick and Leonard Goodman*, 39JTAX24, Jul73.
Deduction for R&D expenses tougher for individuals, 39JTAX219, Oct73.
Does condemnation threat alter subdivision of land?, 39JTAX143, Sep73.
Gain on transfer of property for annuity not deferred, 39JTAX142, Sep73.
Has Tax Court extended the break on deferred payments?, 39JTAX280, Nov73.
How extensive are the absorption costing requirements in the final inventory Regs?, *by Robert Feinschreiber*, 39 JTAX338, Dec73.
How the controlling shareholder can sidestep Section 482 reallocation dangers, *by Charles T. Crawford*, 39JTAX 102, Aug73.
Installment reporting: Non-capital asset qualifies, 39JTAX22, Jul73.
Intangible asset deductions given a boost by CA-5, 39JTAX220, Oct73.
Noncorporate 1971 business income figures released, 39JTAX282, Nov73.
Professional sports teams: Tax factors in buying, owning and selling them, *by Lewis S. Klinger*, 39JTAX276, Nov 73.
Recent cases evince shift toward IRS position in 482 allocation cases, 39 JTAX342, Dec73.
Tax Court okays IRS mandatory change, 39JTAX144, Sep73.
Tax Court upholds IRS automatic allocation under 265(2), 39JTAX105, Aug 73.
TC further restricts interest deduction for tax exempts, 39JTAX142, Sep73.
The ADR system: An analysis of the final Regs and how practitioners should use them, *by Thomas P. Scholler, John G. Traller and Irwin Wagner*, 39JTAX16, Jul73.
The excess investment interest limitation: How it works and how to plan to avoid it, *by Stewart R. Josephs, Sawyer A. Tuller and Marvin Greenberg*, 39JTAX214, Oct73.
Treasury's final Regs for depreciating pre-1971 property: How they operate, *by Thomas P. Scholler, John G. Traller and Irwin Wagner*, 39JTAX136, Sep73.
Turnaround: Taxpayer proves taxable sale took place, 39JTAX140, Sep73.
Validity of foreign corp upheld despite personal control, 39JTAX281, Nov73.
What is useful life of assets used to construct other assets?, 39JTAX29, Jul73.

COMPENSATION

Consolidations of qualified plans: How are they treated; what are the dangers?, *by Raymond I. Bodnar*, 39JTAX 242, Oct73.
Determination letters for qualified plans on the increase, 39JTAX186, Sep73.
How Proposed Section 83 Regs create traps in restricted stock and stock option areas, *by John J. Sexton and James M. Boyle*, 39JTAX184, Sep73.
IRS backtracks on computation of lump-sum payouts, 39JTAX99, Aug73.
Rev. Rul. 73-338: Does it solve the question of policy transfers to employees' trusts?, *by Sherwin P. Simmons*, 39 JTAX372, Dec73.
The *Basye* decision one year later: Judging its effect upon related areas, *by Larry E. Shapiro*, 39JTAX376, Dec73.
Watch out for disqualifications through doctrine of merger, 39JTAX379, Dec 73.

CORPORATE

Adherence to Code, not Regs, controls charitable deduction, 39JTAX336, Dec 73.
Boot received in reorg may warrant capital gain treatment, 39JTAX236, Oct73.
CA-6 further defines "property" for purposes of 337, 39JTAX335, Dec73.
CA-6 holds that 304 takes precedence over 351, 39JTAX168, Sep73.
CA-9 requires capitalization of contingent debt payment, 39JTAX264, Nov 73.
Checklist for 351 ruling requests revised by IRS, 39JTAX61, Jul73.
Corps not subject to dividend rules lose 531 shield, 39JTAX336, Dec73.
Courts disagree on treatment of fire loss related expenses under 337, 39JTAX 335, Dec73.
Final Regs on Section 279 expand and clarify the prior Treasury rules, *by James K. Hasson, Jr.*, 39JTAX160, Sep73.
Guidelines for ceiling dividend payments during 1973, 39JTAX168, Sep73.
How the recent consolidated Reg amendments clarify the investment adjustment, *by James F. Dring*, 39JTAX266, Nov73.
"Mistaken" consolidated return cannot be disavowed, 39JTAX234, Oct73.
Nonbusiness use does not bar loss deduction for corporation, 39JTAX235, Oct 73.
Nontaxable distributions no automatic bar to benefits of Section 337 says IRS, 39JTAX234, Oct73.
Ordinary deductions for advances to new corp. possible, 39JTAX236, Oct73.
Parent's needs may justify accumulations by subsidiary, 39JTAX72, Aug73.
Parent-sub simultaneous liquidation at one tax ok'd, 39JTAX264, Nov73.
Practical planning for the reverse triangular merger technique of Section 368(a)(2)(E), *by Donald A. Pleasants*, 39JTAX66, Aug73.
Sales can't be imputed to corporation without negotiation, 39JTAX60, Jul73.
Straw corporations: When will they be recognized: what can and should be done, *by Saul Duff Kronovet*, 39JTAX 54, Jul73.
Tax-free incorporation: Are courts today taking too restrictive a view of Section 351?, *by Arnold C. Goldstein*, 39JTAX165, Sep73.
Temporary use of corp.'s cash does not destroy liquidation, 39JTAX73, Aug 73.
The investment adjustment rules of the consolidated return Regs: How they work, *by James F. Dring*, 39JTAX330, Dec73.
Treatment of minority stockholders in merger, 39JTAX169, Sep73.
What determines who's taxed on liquidation distribution, 39JTAX73, Aug73.
When will Section 337 shield fire loss proceeds? A current look at a burning issue, *by Mark H. Kovey*, 39JTAX258, Nov73.
Will Sec. 337 shelter casualty insurance? Courts split, 39JTAX285, Oct73.

ESTATES, TRUSTS & GIFTS

A draftsman's guide to the potential hazards of trust boiler plate language, *by Maxwell J. Knuthe*, 39JTAX114, Aug 73.
Court bars 2035 contention on assignment of flight insurance, 39JTAX210, Oct73.
Courts bar including wrongful death proceeds in an estate, 39JTAX5, Jul73.
Estates of nonresident aliens may exclude U. S. corp. debts, 39JTAX118, Aug73.
Lowering of age of minority has no effect on availability of exclusion, 39JTAX 209, Oct73.
Paying the estate tax in installments: Planning to use and working with Sec. 6166, *by Stanley Rosenberg*, 39JTAX 302, Nov73.
Power of appointment with payment not excluded, 39JTAX118, Aug73.
Power to pledge policies causes their inclusion in estate, 39JTAX211, Oct73.
Renunciation of testate share: What is a reasonable time?, 39JTAX117, Aug 73.
Structuring a net gift that will stand up: How to satisfy the IRS and the courts, *by Robert S. Schriebman*, 39JTAX6, Jul73.
The Supreme Court's *Cartwright* decision: Does it signal new valuation disputes?, *by Robert P. Wilkins*, 39JTAX 2, Jul73.
Trust costs can be deductible estate administration expenses, 39JTAX118, Aug73.
Unpaid estate debts hit twice: deduction —no; income—yes, 39JTAX209, Oct73.
What will effect of Proposed Regulations on corporate-owned life insurance be?, *by Paul H. Walker*, 39JTAX206, Oct73.

EXEMPT INSTITUTIONS

How organizations can meet the "public charity" requirements of 509(a)(1) and (2), *by William D. Buratt*, 39 JTAX316, Nov73.
IRS looking at problems of 501(c)(6) organizations, 39JTAX313, Nov73.
Special Services Staff of IRS to be disbanded, 39JTAX313, Nov73.
Working with Treasury's reproposed Regs on arbitrage bonds under Section 103(d), *by C. Willis Ritter*, 39JTAX 130, Sep73.

FRAUD & NEGLIGENCE

Supreme Court says "willfully" has only one meaning, 39JTAX79, Aug73.
Supreme Court's *Bishop* decision: A useful clarification of "willful" in the fraud area, *by Louis Bender*, 39JTAX 188, Sep73.
TC sees no bar to using records from taxpayer's employee, 39JTAX80, Aug 73.
The *Miranda* warnings: To what extent must the IRS comply in tax fraud investigations?, *by Terry Philip Segal*, 39JTAX76, Aug73.

INTERNATIONAL TRADE

"Decontrolling" a corporation to remove the controlled-foreign-corporation taint, *by Alan R. Rado*, 39JTAX322, Dec73.
First post-1962 figures on foreign income and taxes, 39JTAX274, Nov73.
Highlights of the Proposed Regs on allocation and apportionment of deductions, *by Robert T. Cole*, 39JTAX272, Nov73.
International tax conference in Singapore, Jan.27-Feb. 2, 39JTAX327, Dec 73.
No moving expense deduction if income is excludable, 39JTAX274, Nov73.
Pre-1963 E&P count in determining Subpart F income, 39JTAX326, Dec73.
Section 962: Relief for U. S. shareholders; how to make election, its effects; when to use it, *by Robert C. Boffa*, 39 JTAX48, Jul73.
U. S. tax exemption for foreign governments, international organizations, their employees, *by Robert S. Rendell and Beat Stiefel*, 39JTAX108, Aug73.
When is special marginal costing rule for DISCs beneficial?, 39JTAX51, Jul 73.

PARTNERSHIPS & SUBCHAPTER S

How recent legislation materially affects the treatment of Subchapter S shareholders, *by L. L. Bravenec*, 39JTAX 12, Jul73.
Limited partnerships: How far can IRS go in limiting their use in tax shelters?, *by Robert C. Livsey*, 39JTAX123, Aug 73.
Use of nonrecourse loans in tax planning: The possibilities and the pitfalls, *by Robert E. Wangard*, 39JTAX 286, Nov73.

PAYROLL

Subsidiary corporations escape FICA liability on wages paid by parent, 39 JTAX159, Sep73.

PERSONAL

An analysis of the current court and Treasury thinking on income averaging, *by John T. Kearns*, 39JTAX248, Oct73.
Charitable deduction allowed for promissory note, 39JTAX298, Nov73.
District Ct. says unemployeds can't deduct agency fees, 39JTAX352, Dec73.
Does innocent spouse provision of Section 6013(e) unjustly favor women?, 39JTAX155, Sep73.
Estate planning fees deductible? says "yes and no," 39JTAX40, Jul73.
IRS rules on office at home expenses rejected by Tax Court, 39JTAX8, Jul 73.
IRS sets 265(2) deduction limits on type property, 39JTAX94, Aug73.
Is incorporating horse or cattle operations the answer to avoid the rule of Section 183?, *by James A. Fiore and Henry W. Schmidt, Jr.*, 39JTAX 90, Aug73.
1971 minimum tax collection brings tacks on its provisions, 39JTAX, Aug73.
Parent may count support furnished new spouse, 39JTAX41, Jul73.
Scholarship and fellowship grants: analysis of factors needed for exclusion, *by Herman Clurman and Edith N. Reiner*, 39JTAX150, Sep73.
S. Ct. rules on deduction for transporting tools to work, 39JTAX155, Sep73.
Tax Court again rebuffs IRS on home office rules, 39JTAX295, Nov73.
Tax Court holds for taxpayer on Section 119 exclusion, 39JTAX, Oct73.
Taxpayer wins first case on what qualifies as a lobbying expense deduction, 39JTAX297, Nov73.
TC allows loss deduction on sale of inherited home, 39JTAX296, Nov73.
TC's position on insider profits again rejected, 39JTAX156, Sep73.
The *Merians* decision: What are implications for tax planning questions?, *by Sterling L. Weaver*, 39JTAX 348, Dec73.
The prepaid feed expense deduction: What is the current outlook in view of *Mann?*, *by William V. Phelan* and *Stephen F. Bright*, 39JTAX293, Oct 73.
Transfer of individual life policy for favorable ruling, 39JTAX295, Nov73.
When can a taxpayer deduct expenses incurred to protect his personal business reputation?, *by Stefan F. Tucker*, 39JTAX36, Jul73.

PROCEDURES

About 70% of all audit cases are closed by agreement, 39JTAX45, Jul73.
Harassment, vague threats of "litigation" are duress, says TC, 39JTAX, Dec73.
High level personnel announcements made by IRS, 39JTAX369, Dec73.
How far can tax men go in obtaining IRS materials under the FIA?, *by Robert L. Zuckerman*, 39JTAX194, Oct 73.
How trial advocacy helps tax men and win administrative tax matters, *by Michael I. Saltzman*, 39JTAX, Aug73.
IRS can get ID numbers and names of preparer's clients, 39JTAX87, Aug73.
IRS Commissioner reveals changes in audit procedure, 39JTAX316, Nov73.
IRS to get more money but not more Agents, 39JTAX87, Aug73.
IRS to use DIF in selecting corporate returns for audit, 39JTAX203, Oct73.
No Tax Court jurisdiction to contest notice of penalty, 39JTAX45, Jul73.
Part of compromise payment may be deductible; IRS eases rule, 39JTAX, Oct73.
Recent cases reveal which IRS documents taxpayers may obtain under FIA, 39 JTAX180; Sep73.
Six districts get new directors; other changes, 39JTAX201, Oct73.
Skeleton or comprehensive pro: What are the advantages of each, 39 JTAX368, Dec73.
Supreme Court determines time for appealing decisions, 39JTAX86, Aug73.
Survey indicates average fees charged for tax practice, 39JTAX86, Aug73.
Survey indicates taxation is profitable law specialty, 39JTAX202, Oct73.
Taxpayer may not keep refund from timely claim, 39JTAX316, Nov73.
Treasury, IRS and Tax Court announce changes, 39JTAX45, Jul73.
Violation of administrative procedure bar to deficiency, 39JTAX200, Oct73.

REAL ESTATE

Tax treatment of and planning for reverse condemnation proceeds, by *E. Anderson*, 39JTAX224, Oct73.

SHOP TALK

Bankruptcy court handles tax case without proof of claim, 39JTAX192, Sep73.
Benefits of wife as employee in unincorporated business, 39JTAX127, Aug

t interests" trust provsion results in tate tax liability, 39JTAX319, Nov

fornia association problem surfaces Delaware, 39JTAX381, Dec73.

fornia limited partnership taxed as rporation, 39JTAX63, Jul73.

bid on foreclosure create interest in- me to creditor?, 39JTAX321, Nov73.

IRS apply Section 183 to real estate x shelters?, 39JTAX129, Aug73.

non-negotiable note trigger gain on ck agreement?, 39JTAX255, Oct73.

munity property effect of wife as an mployee, 39JTAX321, Nov73.

erring warrant income to save REIT tatus, 39JTAX255, Oct73.

Does imputed interest rule apply in reorganizations?, 39JTAX127, Aug73.

Do partnership loans to Sub S hike stockholder's basis?, 39JTAX256, Oct73.

Gift tax may result on split-dollar life insurance, 39JTAX191, Sep73.

IRS disallows prepaid interest deduction of partnership, 39JTAX65, Jul73.

IRS softening stand on second-class-of-stock in Sub S?, 39JTAX191, Sep73.

IRS to treat trade group dues as unrelated income, 39JTAX129, Aug73.

More on prepaid interest deduction of a partnership, 39JTAX320, Nov73.

Negative stock basis in incorporating of cash basis business, 39JTAX191, Sep 73.

Partnership's prepaid interest disallowance stirs problems, 39JTAX255, Oct 73.

Produce exchange becomes REIT, eliminates double tax, 39JTAX127, Aug73.

Prompt funding of marital deduction trust avoids problem, 39JTAX381, Dec 73.

Trap in lowering majority age for 2503 (e) trust, 39JTAX381, Dec73.

Use of partnership warrant in real estate syndications, 39JTAX319, Nov73.

SPECIAL INDUSTRIES

Can mutual funds that engage in convertible hedging maintain their tax-free status?, *by Lloyd E. Shefsky*, 39JTAX 228, Oct73.

SPECIAL REPORT

Computer prepared returns: Cost and alternatives increase this year, *by the Editorial Staff*, 39JTAX356, Dec73.

STATE & LOCAL TAXATION

An analysis of important recent developments in the state and local tax area, *by James H. Peters*, 39JTAX172, Sep 73.

AUTHORS

Paul E. Anderson
Louis Bender
Raymond L. Bodnar
Robert C. Boffa
James M. Boyle
L. L. Bravenec
Stephen F. Bright
William D. Buratt
Robert I. Chalnick
Herman Clurman
Robert T. Cole
102 Charles T. Crawford
266, 330 James F. Dring
338 Robert Feinschreiber
90 James A. Flick, Jr.
165 Arnold C. Goldstein
24 Leonard Goodman
214 Marvin Greenberg
160 James K. Hasson, Jr.
214 Stuart R. Josephs
248 John T. Kearns
276 Leslie S. Klinger
114 Maxwell J. Knuthe
258 Mark H. Kovey
54 Saul Duff Kronovet
123 Robert C. Livsey
172 James H. Peters
292 William V. Phelan
66 Donald A. Pleasants
322 Alan R. Rado
150 Edward N. Reiner
108 Robert S. Rendell
130 C. Willis Ritter
302 Stanley Rosenberg
82 Michael I. Saltzman
90 Henry W. Schmidt, Jr.
16, 136 Thomas P. Scholler
6 Robert S. Schriebman
76 Terry Philip Segal
184 John J. Sexton
376 Larry E. Shapiro
228 Lloyd E. Shefsky
372 Sherwin P. Simmons
108 Beat Stiefel
16, 136 John G. Traller
36 Stefan F. Tucker
214 Sawyer A. Tuller
16, 136 Irwin Wagner
206 Paul H. Walker
286 Robert E. Wangard
348 Sterling L. Weaver
2 Robert P. Wilkins
194 Herbert L. Zuckerman

INDEX OF NEW DECISIONS AND IRS ACTIONS REPORTED IN THIS ISSUE

THE INDEX below lists new court decisions, cases where certiorari has been granted or denied, and IRS actions involving acquiescences, nonacquiescences, Revenue Rulings and Procedures, TIR's, etc. Cases are listed by the significant word or words in the citation, generally the taxpayer's last or principal name. The number is the page where the summary will be found. An asterisk (*) indicates that the case is discussed in an article on the page shown.

Court Decisions

Adam 343
Anderson 369
Atchison, Topeka & Santa Fe Railway Co. 345
Baker 355
Barnes 328
Bishop 328
Brewer 328
Brooks-Massey Dodge, Inc. 346
Carr-Staley 329
*Cary 341
Cole 344
Collins 353
*Columbia Iron & Metal Company 336
Cox 344
D'Agostino 370
Delta Life Insurance Co. 328
Di Varco 328
*Dougherty 326
Elrick 346
Escofil 346
Fabiani 344
Fessey 344
*Fitzgerald Motor Company 342
Grossman 354
Harmel 328
Harper 371
Henke 353
Higby 371
Hull 355
Imperial General Life Insurance Co. 329
Joffe 370
Johnson 353
Johnston 370
Jordan 344
*Kahler Corporation 342
Kahn, Estate of 371
Klayman 344
Krist 354
Kuehn 369
Kurczmarski 369
Laing 371
Lee 328
Lust 354
*Miller 351
Moody 328
Mcor 327
Musso 370
Niki 327
Offshore Operations Trust 346
Oliver 370
Partin 370
Rea 370
Resorts International, Inc. 337
Riley 370
*Robertson 368
Roth 380
Sanzogno 371
Schwartz 346
Smith 328
Smith 354
Southern Fruit Distributors 344
Stribling 328
Strutzel 343
L. C. Thomsen & Sons 346
Title Insurance and Trust Co. 337
UMCO Corporation 345
Upton 354
Valdes 370
Wallace 354
Weary 355
Wilt 370
Zenoff 370

Revenue Procedures

Rev. Proc. 73-17, IRB 1973-32 371
Rev. Proc. 73-18 327
Rev. Proc. 73-19, IRB 1973-38 371

Revenue Rulings

Rev. Rul. 73-298 337
Rev. Rul. 73-299 380
Rev. Rul. 73-302 328
Rev. Rul. 73-324 344
Rev. Rul. 73-325 355
Rev. Rul. 73-328 343
Rev. Rul. 73-329 343
Rev. Rul. 73-330 371
Rev. Rul. 73-333 329
Rev. Rul. 73-340 371
Rev. Rul. 73-341 343
Rev. Rul. 73-345 371
Rev. Rul. 73-348 344
Rev. Rul. 73-350 327
*Rev. Rul. 73-351 353
Rev. Rul. 73-353 371
Rev. Rul. 73-354 327
Rev. Rul. 73-355 355
Rev. Rul. 73-356 355
Rev. Rul. 73-357 345
Rev. Rul. 73-358 328
Rev. Rul. 73-359 380
Rev. Rul. 73-360 327
Rev. Rul. 73-364 328
Rev. Rul. 73-365 371
Rev. Rul. 73-372 327
Rev. Rul. 73-373 327
Rev. Rul. 73-379 380
Rev. Rul. 73-384 353
Rev. Rul. 73-385 346
Rev. Rul. 73-386 329
Rev. Rul. 73-390 353
Rev. Rul. 73-391 353
Rev. Rul. 73-392 354
Rev. Rul. 73-393 345
Rev. Rul. 73-394 329
Rev. Rul. 73-396 346

Regulations

Prop. Fed. Reg. 10/9/73 346
T.D. 7286, 9/26/73 346
T.D. 7288, 9/28/73 327

Announcements

73-71, IRB 1973-28 370
73-75, IRB 1973-29 370
73-85, IRB, 1973-35 371
73-86, IRB 1973-35 344
*TIR 1199 336

Acquiescences

Bierberdorf 353
Lazarus 343
Oddee Smith 343
Thriftimarket Inc. 343
Wiles 343
Wiles 353